IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

ANNETTA STROTHER,)	
)	
Plaintiff,)	1:13-cv-1397
)	
v.)	Judge Leinenweber
)	Magistrate Judge Keys
MIRAMED REVENUE GROUP, LLC.,)	
)	
Defendant.)	

STIPULATION TO DISMISS PURSUANT TO SETTLEMENT

By agreement, the parties to the above-captioned action, by and through their respective attorneys, state as follows:

- 1. Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, the parties hereby stipulate and agree that the above-captioned action shall be dismissed without costs to either party.
- 2. The parties have reached a settlement accord and are in the process of resolving all remaining issues, such as the terms of the settlement agreement and the conditions for payment of the settlement proceeds.
- 3. In order to ensure that this Court retain jurisdiction to enforce the settlement agreement between the parties, should the need arise, the parties stipulate that the dismissal of the above captioned matter shall be *without* prejudice, without costs to either party, and with leave for any party to seek reinstatement within forty-five (45) days from the date of entry of this Stipulation to Dismiss.
- 4. The parties further stipulate that if this case has not been reinstated within forty-five (45) days from the date of entry of this Stipulation, or a motion for reinstatement has

not been filed by said date, then the dismissal of this case shall automatically convert from a dismissal *without* prejudice to a dismissal *with* prejudice.

5. The parties request that the June 11, 2013 status be stricken.

Date: May 23, 2013

For Plaintiff, Annetta Strother

/s David M. Marco

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